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GENERAL MILLS • EXECUTIVE OFFICES

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October 21, 1999

Via Facsimile: 312-886-7160

Craig Melodia, Esq.
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Re: Skinner Landfill Site

Dear Mr. Melodia:

Per our conversation of today, October 21, 1999, I am faxing to you herewith the following:

1. Ralcorp Holdings, Inc. ("Ralcorp") final allocation
2. Ralcorp's solid waste-in amounts
3. Ralcorp's liquid waste-in volume
4. Final allocation recommendations
5. Ralcorp's preliminary findings

General Mills is making this submission on behalf of Ralcorp. The documents are submitted to you in connection with a proposed settlement offer in the above-referenced case and are not intended, nor may they be construed, as an admission of liability on the part of Ralcorp or General Mills. Further, this submission is not to be construed as an acceptance of any offer until all matters regarding indemnification and contribution protection have been satisfactorily completed and accepted.

Please contact me should you have any questions regarding this submission.

Sincerely,

William C. Crutcher III

Attachments

cc: Gary Olmstead

kw/lbbkk/wcc/trs/sinnamelodia/tr.doc

RALCORP HOLDINGS INC. ("RALCORP")

Ralcorp was responding with respect to a facility located at 41201 Mosteller Road in Sharonville, Ohio. The plant is a steel reinforced concrete building of about 216,000 square feet of floor space situated on twenty-two (22) acres of land located in Sharonville, Hamilton County, Ohio. At the facility's opening in 1959, it made both pet food and cereal. Production of pet food stopped in 1981.

The facility produced extruded pet foods, including dog chow, cat chow, and puppy chow. Only dry pet foods were produced. The major ingredients for the various pet foods were the same, namely, wheat, corn, oats, whey and soybean meal. The formulas were different for each food and the food additives sprayed on at the end of the production process varied. The extruded pet food process consisted of mixing different grains with water and minor ingredients, putting the mixture in a moving pressure cooker, then pushing the mixture through a mold and cutting it into small pieces. The product was then packaged.

The facility used rendered fat as an ingredient in the process. It was received in rail cars and pumped directly into the pet food process. Small amounts of spoiled fat (shovels full) may have occasionally been placed in the trash when there was a small spill or when fat spilled on the floor or leaked from piping.

The "extruded" cereals produced included Wheat Chex, Rice Chex and Corn Chex from 1959 to present. Bran Chex was also produced sporadically at the facility as a backup for Ralston's Battle Creek Plant, until the last few years. Ingredients were wheat, corn and rice, which were generally a higher grade than those used for pet food. The extruded cereal process consisted of mixing grain and other ingredients, including sugar, salt and malted barley, then combining the mixture into a pressure cooker and drying it, then running it through rolls to shape it, drying it again, and packaging it.

Snacks have been produced at the facility since 1985. The process involves coating cereal grains with vegetable oil, adding seasonings, then mixing them with pretzels, peanuts and other ingredients.

Over the years the facility has experimented with other food products including stuffing/croutons. In this process, bread was cut, dried, seasoned and packaged for stuffing mix.

The facility has only produced human and animal foods and was regularly inspected by the FDA and the Ohio Department of Agriculture (ODA). Very little waste from the operation was disposed, as it had commercial and/or economic value, Ralcorp stated.

Spent barley was a by-product of the cereal manufacturing process. In this process the facility was "making malt." The process produced about 2,100 pounds of spent barley per day. It was sold to a hog farmer for use as feed. The spent barley was collected at the facility in steel containers referred to as "barley boats." The farmer had a contract to purchase the spent barley which he picked up daily from the facility in his own truck. The farmer would shovel the spent barley out of the barley boats and into his own truck. The facility stopped malting barley in 1978 and began using liquid malt. None of the spent barley was sent to Skinner, the response stated.

"Screenings" were produced at the Mill building from all grain handled at the facility. Screenings are the residue which comes from moving, loading, unloading, cleaning, and hauling grain. Screenings were stored in a large bin. They were pneumatically collected by the dust handling system and manually collected from floor sweepings. They were loaded onto rail cars, trucks, or into bags, and shipped to other Ralcorp animal feed mills, or sent to other feed mills or farmers. Screenings were not sent to the Skinner site, the response stated.

Reground cereal was used in the pet food process and was not sent to the Skinner Landfill. Wet food waste and floor sweepings were also sold to farmers for feed.

Connection to the Skinner Landfill. From 1959 to 1976 the facility burned its own trash, which was predominantly packaging materials. The ashes from the incinerated trash were placed in fifty-five (55) gallon drums and loaded on a facility owned truck and transported to the Skinner Landfill, emptied, and then transported back to the facility to be refilled. The ash drums were stored at the facility next to the incinerator until filled and transported.

A facility employee drove the truck throughout this entire time period. There was virtually only one driver transporting wastes from the facility to Skinner during this period. During his interview, he stated that, in addition to the ash, the items transported to the Skinner Landfill on the truck were paper, floor sweepings, grass clippings, cereal boxes, some with cereal in them, old wooden pallets, empty whey bags, roof sweepings, pet bailer bags, some with pet food in them, and occasionally small amounts of rendered fat. He loaded the drums into the truck, unloaded the drums at Skinner, and returned the empty drums to the facility. He had direct knowledge that no hazardous substances or hazardous wastes were ever sent to Skinner, the response stated.

The driver stated that about 18 to 20 drums were taken in each shipment, about once each week.

The company stated that old wooden pallets were transported to the Site from 1959 until they became reusable, at which time they were sold to a vendor for recycling. Ralcorp estimated that one (1) truckload was transported every 2 to 3 months as the truck was filled. Some of the pallets were possibly transported to Skinner along with other wastes.

The facility roof was cleaned weekly and various grains, gravel, and dust were swept up and disposed of in the trash. From 1959 to the early 1970s, this waste was transported to the Skinner Landfill using the same truck that transported other waste. After this time period, this waste was placed in dumpsters and removed by a hauling company.

An estimated truck-full of whey bags was disposed at Skinner, about every three (3) months. Whey, an ingredient in the puppy chow pet food, was not used at the facility until about 1963 and only until 1981.

A bailer was used to bail paper cartons and ship them for recycling in the 1970s. Some of the cartons had a plastic lining and could not be recycled. These cartons were incinerated at the facility and the ashes were transported to the Skinner Site until the 1970s, when the plastic lined cartons were hauled by Rumpke Waste, Inc. or Clarke's Services, Inc. for disposal or incineration.

From 1971 to 1976, the amount of waste sent to Skinner decreased as the hauling companies were being used (see below). In 1976, the facilities stopped using the Skinner Landfill because the cereal facility was no longer incinerating waste and had no more ash to be disposed.

Other Transporters and Disposal of Other Wastes. Ralcorp also provided the following information regarding other transporters or wastes. The facility used Browning Ferris Industries ("BFI") beginning in about 1971. The facility switched to Clarke's at some point. After 1971, the facility used Clarke's, Rumpke or BFI, and switched among them.

Beginning in 1959, the facility used a methyl bromide/ethylene dibromide liquid mixture "Dawson 73" for spot fumigation of empty machinery or containers. The facility used Phostoxin for space fumigation. Vapona was used in the 1980s and pyrethrin in the 1990s. All fumigants were applied at the facility to control insects and none was left for disposal. All pesticides were stored at the facility in 55-gallon drums in the pesticide building. The facility usually stored two 55-gallon drums of pesticide. About fourteen gallons of pesticide were used each month. All empty containers were double rinsed and placed into dumpsters that were hauled away by Rumpke's, Clarke's, or BFI. No pesticides were disposed of or sent to Skinner. Empty pesticide containers were disposed of, but not sent to Skinner.

The facility has used solvent and oils in its operation since 1959. Waste oils and solvents were shipped to an off-site vendor for recycling. Before 1986, three companies hauled the facility's used oil and solvents: Keenan Oil Co., Ohio Valley Petroleum Co. and Este Oils Co. Fresh oil was purchased in 55-gallon drums from Mobil Oil, Texaco, Shell, and Dubois. An average of 10 to 15 drums of fresh oil were stored in a caged room in the facility's maintenance area. All oils were stored in this manner, including oil from lubricating, cutting, and general-purpose oil. About 10 to 15 drums of used oil were generated every three (3) months from gearboxes, cutting operations and grinding. Used oil was hauled away by vendors on an as needed basis. Vendors would pneumatically take used oils and solvents from the drums, leaving the drums at the facility. About 5 drums of solvents were stored in the facility's Butler building maintenance area. About 55 gallons of solvent were used every two months. Used solvents were generated from parts cleaning operations. Initially, the facility used Inhibisol, a chlorinated solvent, and later switched to Stoddard Solvent, which is non-chlorinated. Waste oils and solvents were disposed of in the same manner as described above (by a hauler). In June 1986, Safety Kleen began hauling away the waste solvents and oils. Oil drums were returned to the seller for deposit. Queen City Barrel of 1937 South Street, Price Hill, Ohio 45204, purchased empty drums. The oils and solvents were never sent to Skinner or any other landfill nor were they mixed with any of the facility's waste streams, Ralcorp states.

Boiler chemicals were used and stored at the facility since 1959 and included phosphate, sulfite, alkali, and some tannin. These materials were completely spent during use and no waste was generated. Initially these materials were purchased in dry 100-pound bars and the bags were burned with other paper. In the 1980s the facility began purchasing liquid boiler chemicals in 55 gallon plastic drums. These drums were rinsed out and hauled away or used as trash containers.

Paint and thinners were stored in inflammable cabinets in the basement of Building 5. While the facility performed small paint projects, most of this work was contracted out. The facility usually had about twenty (20) gallons of paint at any one time, plus about 5 gallons of

thinner. Empty paint cans and cans with dried paint went into trash dumpsters which were hauled away. Cans with solvent or paint in them were disposed with the solvent accumulated from maintenance and hauled away with the oils and solvents. None of the paint, thinners, or cans were sent to Skinner, Ralcorp stated.

In 1980 three (3) drums of PCBs (polychlorinated biphenyls) used to refill transformers were hauled away for storage and disposed of by a licensed vendor, High Voltage Maintenance. The facility also arranged for a licensed contractor to dispose of three PCB transformers which were located on the roof of the pet food building. Three (3) other transformers located near the boiler house in the electrical sub-station had PCBs removed by High Voltage Maintenance. Ralcorp sent no PCB's or transformers to Skinner.

Since 1959, the facility has used mercury thermometers. When they broke, they were cleaned up using spill kits, placed in lab packs and sent to Ralston's headquarters in St. Louis for disposal.

Laboratory wastes consisted of various acids (including without limitation acetic acid and nitric acid), methanol, buffer solutions, iodine, and sodium chloride. Since 1959, lab wastes were neutralized and flushed down the sanitary sewer. Some were packaged using spill kits and forwarded to corporate headquarters in St. Louis. In addition, licensed contractors picked up used lab chemicals for disposal. Empty containers went into dumpsters. Small amounts of high temperature oils from the lab were disposed of with other oils from the facility. Lab wastes were not disposed of at Skinner.

Site Witnesses. Ray Skinner recalled that Ralcorp was the source of 10-12 loads of demolition debris plus a load of drums at least monthly. He described the disposal as occurring for an "awful long time," which he said was at least five to ten years. He said that Ralcorp used a 7-8 cys straight body truck. His description of the waste was embraced by that described in the questionnaire response. R. Skinner Depo., p. 40, 504-507. Elsa Skinner remembered Ralcorp as well. She said it was a customer for well over 2-3 years.

Skinner Log. Ralcorp appears in the Skinner log six times, once in 1960 (November 19, \$12), once in 1961 (March 15, \$30), once in 1962 (July 12, \$24), twice in 1963 (August 12 for \$9 and September 7 for \$15) and once in 1966 (September 12 for \$9). This particular party demonstrates that the log is very incomplete.

Waste-in Amount. Plaintiffs have argued that Ralcorp's supplemental questionnaire response represents over 20,000 cys of waste. I have reviewed Plaintiffs' calculations carefully. They appear to include a double counting.

As I read the questionnaire response, Ralcorp is conceding that for a period of 18 years it hauled incinerator ash, paper, floor sweepings, grass clippings, cereal boxes (some with cereal in them), old wooden pallets, empty whey bags, roof sweepings, pet bailer bags (some with pet food in them), and occasionally small amounts of rendered fat, in 18 to 20 drums for disposal at the Landfill weekly. This statement represents 4,840 cys (the midpoint of 19 drums x 55 gallons x 52 weeks x 18 years divided by 202 gallons/cy).

Plaintiffs then added roof sweepings as a separate waste-in total, but as I read the

questionnaire response, the roof sweepings were transported with the other materials hauled weekly to the Site.

I do agree that the wood pallets and whey bags appear to require a separate accounting, as Plaintiffs have presented and as I read the questionnaire response. The only evidence on the capacity of the vehicle used by Ralcorp comes from Ray Skinner's testimony. I am taking the midpoint of that capacity estimate (7.5 cys) and assuming 5 loads per year based on the questionnaire response. The number of years is unclear. Ralcorp said they were transported from 1959 until they became reusable. It did not say when that was. In the absence of better information, I am going to use the same figure used for the other waste -- 18 years -- here. These figures produce an addition 675 cys.

As to the whey bags, it does appear that they merit a separate accounting as well. Using a truckload every three months as indicated in the questionnaire response produces a total of 420 cys ($7.5 \text{ cys} \times 4 \text{ loads per year} \times 14 \text{ years}$, since the bags were not used until 1963).

Ralcorp does not contest the testimony regarding the disposal of demolition debris at the Site. I will assume the use of the same capacity truck. Multiplying 11 loads \times 7.5 cys produces an additional 83 cys.

The total of these four entries is 6,020 cys.

Other wastes. Plaintiffs argued that Ralcorp used Keenan Oil to collect used oils and solvents, and that Keenan Oil used the Skinner Site; therefore, Ralcorp should be linked to the Skinner Site for used oils and solvents. Ralcorp did not say when it used Keenan Oil, however. I am not prepared on this record to draw as many inferences as Plaintiffs ask me to draw without more information.

I note that Ralcorp also said that it used Ohio Valley Petroleum Co. Ray Skinner testified that Ohio Valley used the Skinner Site. I have not been able to corroborate this fact, however, and Ralcorp does not say when it used Ohio Valley.

Ralcorp explained that, commencing in 1959, the facility used a methyl bromide/ethylene dibromide liquid mixture called "Dawson 73" for spot fumigation of empty machinery or containers. The facility used Phostoxin for space fumigation. The pesticides were stored at the facility in 55-gallon drums in the pesticide building. The facility usually stored two 55-gallon drums of pesticide. Approximately 14 gallons of pesticide were used monthly. Hence, the facility generated about 3 empty pesticide drums per year.

Ralcorp explained that all empty pesticide containers were double rinsed and placed into dumpsters that were hauled away by Rumpke, Clarke or BFI. None was sent to the Site, I was told. However, Ralcorp did not use BFI until the 1970s. It then switched to Clarke and later also used Rumpke (and at times BFI or Clarke again). What happened to the pesticide drums prior to 1971? When did Ralcorp begin rinsing these drums? I do not believe these drums add to Ralcorp's waste-in amount because the Skinners would not have "dumped" the drums; they would have sold them. The drums might be worth following up on if this matter

is litigated, but on this record, I do not feel comfortable doing more with them that noting the questions I have raised. We can deal with the matter further in the facilitation.

QUEEN CITY BARREL

See the Avon Products, Inc. discussion.

RALCORP HOLDINGS, INC.

Ralcorp did not submit either a Comments Brief or a Reply Brief, but plaintiffs submitted their comments stating that "the Preliminary Report did not accurately reflect the information provided by Ralcorp" and they feel that Ralcorp's waste-in amount was significantly understated.

Plaintiffs argued that Ralcorp stated that "in addition to the ash, the items transported to the Skinner Landfill on the truck were paper, floor sweepings, grass clippings, [etc.]." Plaintiffs point out these additional items were not incinerated and Ralcorp's waste-in amount was based on the assumption that the incinerator ash included these other waste materials.

Ralcorp did not estimate the total amount of these general wastes or the frequency which they were generated, so Plaintiffs assumed that Ralcorp disposed of one load of general waste per week in addition to the incinerator ash. Based on this assumption, Plaintiffs calculated 390 cys of general waste for Ralcorp per year. Over a period of eighteen years, that results in 7,020 cys of general waste (7.5 cubic yards/week x 52 weeks x 18 years).

Plaintiffs, therefore, suggested that Ralcorp's waste-in amount should be 8,200 cys computed as follows:

1. 2,180 cys of general wastes (7,020 cubic yards - 4,840 cubic yards representing the waste-in estimate in the Preliminary Report for Ralcorp's incinerator ash, roof sweepings, and general waste),
2. plus 675 cubic yards of wood pallets,
3. plus 420 cubic yards of whey bags,
4. plus 83 cubic yards of demolition debris equals 8,198 cubic yards. Preliminary Report, App. 2 at 58.
5. 4,842 cys of incinerator ash (19 drums x 55 gallons x 52 weeks x 18 years divided by 202 gallons/cy equals 4842 cubic yards, not 4,840 cys as shown in the Preliminary Report. *Id.* at 47).

I have reviewed the Ralcorp submission. There is some uncertainty in Ralcorp's questionnaire response. At page 6, Ralcorp said that it burned its trash and put the ashes in drums. Then the document states that in addition to ash, items transported to the Landfill on the truck were paper, floor sweepings, grass clippings, cereal boxes and some other items.

Then the document said that about 18-20 drums were taken in each shipment, about once per week.

I interpreted the response as stating that all of the weekly waste – ash and everything else – was shipped in 18-20 drums per week. Plaintiffs suggest that the ash alone represented 18-20 drums per week. I believe that my original interpretation remains the correct one because the reference to 18-20 drums follows the description of the waste hauled on the truck each week.

Waste-in List for the Final Allocation Report and Recommendations, Skinner Landfill Superfund Site, April 12, 1999

PRP	Source	Amount or Capacity	Compaction or Multiplier or Divisor	Frequency or Loads	Wk/Mo/Yr	Years 1 to the default	Solid Sub Total	Liquid Sub Total	Solid Total Cys	Liquid Total Gals	Response Cost Dollar Credit	Solid Waste in Total	Percentage
RALCORP HOLDINGS INC	Skinner R	7.5	1	11	1	1	83					372806	0.0000%
RALCORP HOLDINGS INC		18	1	26	1	13	6084		8020			372806	1.6143%
		688	0.25	8	1	13	11018					372806	
									17102			372806	
		30	1	13	1	1	380					372806	
		12	1	5	1	1	50					372806	
		15	1	350	1	1			450			372806	
		25	0.5	1	1	1	13		5280			372806	
		40	1	1	1	1	40					372806	
		10	0.5	1	1	1	5		83			372806	
		10	1	4	1	1	40					372806	
		0	0	0	0	0			45			372806	
		10	0.6	25	1	1	150					372806	
		20	1	1	1	1	20					372806	
		20	1	100	1	1			175			372806	
		11	1	50	1	1			2000			372806	
		30	0.5	25	1	1	375		550			372806	
		30	0.5	50	1	1	750					372806	
		25	1	2	1	1	50					372806	
		100	1	1	1	1			1175			372806	
		57600	0.5	1	1	1			100			372806	
		0	0	0	0	0			28800			372806	
		1000	0.004850495	2	1	1			0			372806	
		100	1	40	1	1			18			372806	
		298	1	1	1	1	288			0		372806	
		5	1	5	1	1	25					372806	
		15	2	315	1	1	8450		321			372806	
		5	1	10	1	1	50					372806	
		3	1	1	12	8			8800			372806	
									288			372806	
									372806	282252			

**Waste-in List in Liquid Waste Volume Order for the Final Allocation Report and Recommendations, Skinner
Landfill Superfund Site, April 12, 1999**

	Solid	Liquid	Solid Waste		Liquid Waste	
	Waste In	Waste In	In Total	Percentage	In Total	Percentage
Name Of Party	Cys	Gallons	Cys		Gallons	
	0	130150	372906	0.0000%	262252	49.6278%
	10	25475	372906	0.0027%	262252	9.7139%
	480	25000	372906	0.1287%	262252	9.5328%
	60	21100	372906	0.0161%	262252	8.0457%
	6377	16875	372906	1.7101%	262252	6.4346%
	2440	11550	372906	0.6543%	262252	4.4042%
	0	9235	372906	0.0000%	262252	3.5213%
	24	6000	372906	0.0064%	262252	2.2879%
	148	5075	372906	0.0396%	262252	1.9352%
	0	5000	372906	0.0000%	262252	1.9066%
	119	3548	372906	0.0319%	262252	1.3527%
	0	2475	372906	0.0000%	262252	0.9437%
	417	550	372906	0.1118%	262252	0.2097%
	27021	110	372906	7.2459%	262252	0.0419%
	25552	110	372906	6.8520%	262252	0.0419%
	110842	0	372906	29.7239%	262252	0.0000%
	54402	0	372906	14.5887%	262252	0.0000%
	28800	0	372906	7.7231%	262252	0.0000%
	17125	0	372906	4.5923%	262252	0.0000%
	17102	0	372906	4.5860%	262252	0.0000%
	9500	0	372906	2.5476%	262252	0.0000%
	7840	0	372906	2.1024%	262252	0.0000%
	7350	0	372906	1.9710%	262252	0.0000%
	6030	0	372906	1.6170%	262252	0.0000%
RALCORP HOLDINGS INC	6020	0	372906	1.6143%	262252	0.0000%
	5440	0	372906	1.4588%	262252	0.0000%
	5250	0	372906	1.4079%	262252	0.0000%
	4160	0	372906	1.1156%	262252	0.0000%
	4157	0	372906	1.1148%	262252	0.0000%
	3598	0	372906	0.9647%	262252	0.0000%
	3518	0	372906	0.9433%	262252	0.0000%
	2000	0	372906	0.5363%	262252	0.0000%
	1976	0	372906	0.5299%	262252	0.0000%
	1800	0	372906	0.4827%	262252	0.0000%
	1445	0	372906	0.3874%	262252	0.0000%
	1175	0	372906	0.3151%	262252	0.0000%
	1000	0	372906	0.2682%	262252	0.0000%
	948	0	372906	0.2542%	262252	0.0000%
	835	0	372906	0.2239%	262252	0.0000%
	770	0	372906	0.2065%	262252	0.0000%
	724	0	372906	0.1941%	262252	0.0000%
	660	0	372906	0.1770%	262252	0.0000%
	552	0	372906	0.1480%	262252	0.0000%
	550	0	372906	0.1475%	262252	0.0000%
	580	0	372906	0.1341%	262252	0.0000%

Final Allocation Recommendations In Alphabetical Order, Skinner Landfill Superfund Site, April 12, 1999

Name Of Party	Solid Waste In Cys	Liquid Waste In Gallons	Solid Waste In Total Cys	Percentage	Liquid Waste In Total Gallons	Percentage	Solid Waste	Liquid Waste	Owner/Operator & Part of Chem-Dyne	Rest of Chem-Dyne	Total
			372908		262252						
	880	0	372908	0.1770%	262252	0.0000%	0.02%	0.00%			
	0	130150	372908	0.0000%	262252	49.6278%	0.00%	9.93%			
	835	0	372908	0.2239%	262252	0.0000%	0.02%	0.00%		0.083333%	
	417	850	372908	0.1118%	262252	0.2097%	0.01%	0.04%			
	10	0	372908	0.0027%	262252	0.0000%	0.00%	0.00%			
RALCORP HOLDINGS INC	6020	0	372908	1.6143%	262252	0.0000%	0.16%	0.00%			0.16143%
	17102	0	372908	4.5860%	262252	0.0000%	0.46%	0.00%			
	0	0	372908	0.0000%	262252	0.0000%	0.00%	0.00%		0.083333%	
	450	0	372908	0.1207%	262252	0.0000%	0.01%	0.00%			
	5250	0	372908	1.4079%	262252	0.0000%	0.14%	0.00%			
	53	0	372908	0.0142%	262252	0.0000%	0.00%	0.00%			
							0.00%	0.00%	87%		
	45	0	372908	0.0121%	262252	0.0000%	0.00%	0.00%			
	0	0	372908	0.0000%	262252	0.0000%	0.00%	0.00%			
	170	0	372908	0.0456%	262252	0.0000%	0.00%	0.00%		0.083333%	
	2000	0	372908	0.5363%	262252	0.0000%	0.05%	0.00%			
	550	0	372908	0.1475%	262252	0.0000%	0.01%	0.00%			
	1175	0	372908	0.3151%	262252	0.0000%	0.03%	0.00%			
	10	0	372908	0.0027%	262252	0.0000%	0.00%	0.00%			
	0	0	372908	0.0000%	262252	0.0000%	0.00%	0.00%			
	100	0	372908	0.0268%	262252	0.0000%	0.00%	0.00%			
	0	0	372908	0.0000%	262252	0.0000%	0.00%	0.00%		1.0%	
	321	0	372908	0.0861%	262252	0.0000%	0.01%	0.00%			
	9500	0	372908	2.5478%	262252	0.0000%	0.25%	0.00%			
	268	0	372908	0.0772%	262252	0.0000%	0.01%	0.00%			
	372906	262252					10.00%	20.00%	68.00%	2.00%	100%
	cys	gallons									